

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 4:18CR87
	§	Judge Mazzant
LAURA JORDAN (1)	§	
a/k/a Laura Maczka	§	
MARK JORDAN (2)	§	

**AGREED MOTION FOR AN ORDER FINDING CASE COMPLEX
UNDER 18 U.S.C. §§ 3161(h)(7)(A) & (B)(ii)**

The United States of America respectfully requests the Court find this case complex under 18 U.S.C. §§ 3161(h)(7)(A) & (B)(ii) because the complex and unusual nature of the prosecution make it unreasonable to expect adequate preparation for pretrial proceedings or the trial itself within the time limits established.

On May 10, 2018, a federal grand jury for the Eastern District of Texas returned a seven-count Indictment against both defendants charging violations of 18 U.S.C. § 1349 (Conspiracy to Commit Honest Services Wire Fraud), 18 U.S.C. § 1343 (Honest Services Wire Fraud), 18 U.S.C. § 371 (Conspiracy), 18 U.S.C. § 666(a)(1)(B) (Bribery Concerning Program Receiving Federal Funds), and 18 U.S.C. § 666(a)(2) (Bribery Concerning Program Receiving Federal Funds).

In the course of the investigation, the government amassed a large volume of documentary evidence, and the government interviewed a large number of witnesses. The government agrees that the discovery in the instant public corruption case is too

voluminous to expect defense counsel to adequately prepare for trial within the time limits established by 18 U.S.C § 3161 of the Speedy Trial Act.

Accordingly, the government requests that the Court find this to be a complex case under 18 U.S.C. §§ 3161(h)(7)(A) & (B)(ii) and make specific findings that the ends of justice outweigh the best interest of the public and the defendant in a speedy trial, and set forth in the record of the case reasons for finding that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendants in a speedy trial.

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/
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CERTIFICATE OF CONFERENCE

This is to certify that I have conferred with both defense counsels for the above defendants, regarding the matter and both agreed to this motion.

/s/
Christopher A. Eason

CERTIFICATE OF SERVICE

I certify a true and correct copy was served by electronic filing by CM/ECF to counsel for both defendants on this 22nd day of May 2018.

/s/
Christopher A. Eason